

FILED

AUG 10 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SETH CALIG,

Defendant.

) INDICTMENT

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CASE NO.

1:22 CR 451

Title 18, United States Code,
Sections 371 and 844(i)

COUNT 1

JUDGE NUGENT

(Conspiracy to Commit Arson, 18 U.S.C. §§ 371 and 844(i))

The Grand Jury charges:

GENERAL ALLEGATIONS

1. At all times material herein, Shaia's Parking Lot #41, L.L.C. ("Shaia") owned the real property located at 1242 West 3rd St., Cleveland, Ohio, directly across the street from the Cuyahoga County Justice Center. Shaia contracted with Parking Revenue Recovery ("PRR"), headquartered in Aurora, Colorado, to operate the parking lot located at 1242 West 3rd St., Cleveland, Ohio. Shaia and PRR affected interstate commerce as they purchased supplies and materials from vendors outside of the State of Ohio to perform business operations.

The Conspiracy

2. On or about May 30, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant, SETH CALIG and others, known and unknown and not named herein, knowingly and intentionally, did combine, conspire, confederate and agree together and with each other to violate the laws of the United States, to-wit: arson, in violation of Title 18, United States Code, Section 844(i).

Object of the Conspiracy

3. The object of the conspiracy was for Defendant, SETH CALIG and others, known and unknown and not named herein, to set fire or attempt to set fire to the structure (parking lot booth) Shaia and PRR (“Shaia & PRR booth”) used to operate a parking lot business located 1242 West 3rd St., Cleveland, Ohio.

Overt Acts

4. In furtherance of the conspiracy and to effect its unlawful objects, Defendant, SETH CALIG and others, known and unknown and not named herein, committed the following acts, among others, in the Northern District of Ohio, Eastern Division, and elsewhere:

5. On May 30, 2020 CALIG and others gathered around the Shaia & PRR parking booth located at 124 West 3rd St., Cleveland, Ohio.

6. CALIG ignited a roll of paper towels and cardboard with a lighter and placed them into the Shaia & PRR parking booth and set it on fire.

7. While other persons in the crowd waited for the paper towels and cardboard to ignite, an identified male (not named herein) handed a known co-conspirator a cardboard Corona beer box, which the known co-conspirator placed into the Shaia & PRR parking booth.

8. CALIG and others caused physical damage by fire to the Shaia & PRR parking booth.

All in violation of Title 18, Section 371 of the United States Code.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.